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Counsel to Business Finance Group

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(ALEXANDRIA DIVISION)

IN RE:

*

GMS SUNSET, LLC

*

Case No. 25-11181-BFK

Debtor.

*

Chapter 11

* * * * *

**NOTICE OF MOTION OF BUSINESS FINANCE GROUP FOR ENTRY OF AN
ORDER CONVERTING OR DISMISSING CHAPTER 11 CASE**

PLEASE TAKE NOTICE that Business Finance Group (“Lender”), has filed a Motion for Entry of An Order Converting or Dismissing Chapter 11 Case (the “Motion”), in the above-captioned case, pursuant to which the Lender seeks the entry of an Order converting or dismissing this case pursuant to 11 U.S.C. § 1112(b) and Fed. R. Bankr. P. 9014.

Your rights may be affected. You should read these papers carefully and discuss them with your lawyer, if you have one in this bankruptcy case. (If you do not have a lawyer, you may wish to consult one.)

If you do not want the Court to grant the Motion, or if you want the Court to consider your views on the Motion, **then by Monday, October 13, 2025, you or your lawyer must file a written response with the Clerk of the Bankruptcy Court** explaining your position and mail a copy to:

Steve Bilidas

1141 Elden Street, Ste. 224
Herndon, VA 20170

Richard A. DuBose, III, Esquire
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Matthew W. Cheney
Office of the U.S. Trustee - Region 4
1725 Duke Street
Suite 650
Alexandria, VA 22314

Jack Frankel
Office of the U.S. Trustee
1725 Duke Street, Suite 650
Alexandria, VA 22314

If you mail rather than deliver your response to the Clerk of the Bankruptcy Court for filing, you must mail it early enough so that the Court will receive it by the date stated above.

A hearing is scheduled on the Motion on October 16, 2025 at 11:00 a.m. in Chief Judge Kenney's Courtroom, U.S. Bankruptcy Court, 2nd Floor, 200 S. Washington St., Ctrm I, Alexandria, VA 22314.

IF YOU OR YOUR LAWYER DO NOT TAKE THESE STEPS BY THE DEADLINE REFERENCED ABOVE, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION AND MAY GRANT OR OTHERWISE DISPOSE OF THE MOTION BEFORE THE SCHEDULED HEARING DATE.

Respectfully submitted,

/s/Richard A. DuBose
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Counsel to Business Finance Group

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 22nd day of September, 2025, copies of the foregoing were served via the Court's Case Management/Electronic Case Filing system upon the following parties:

GMS Sunset LLC 1141 Elden Street, Suite 224 Herndon, VA 20170
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Daniel M. Press dpress@chung-press.com, pressdm@gmail.com; danpress@recap.email

And via first class mail, postage pre-paid upon the following parties:

Steve Bilidas
1141 Elden Street, Ste. 224
Herndon, VA 20170

/s/ Richard A. DuBose
Richard A. DuBose